



THE CITY OF NEW YORK
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November 21, 2018

VIA ECF

Honorable P. Kevin Castel
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: James Hurt, Jr. v. City of New York et. al, 15-cv-7612 (PKC)

Your Honor:

I am an attorney in the office of Zachary W. Carter, Corporation Counsel of the City of New York, counsel for defendants City of New York and Sergeant Michael Connizzo. I write jointly, on behalf of the parties in this matter to (1) request permission to file motions *in limine* and to propose a briefing schedule for those motions; and (2) request an adjournment of the final pretrial conference that is currently scheduled for January 11, 2019.

First, the parties have conferred and propose the following dates for motions *in limine*: December 7, 2018 for moving papers and December 21, 2018 for responsive papers. Given the substantial disputes between the parties regarding evidence in the upcoming trial, which is currently scheduled for February 4, 2019, the parties believe that submission of written motions *in limine* will assist the Court with resolution of the outstanding evidentiary issues.

Second, the parties jointly request that the final pretrial conference in this matter, which is currently scheduled for January 11, 2019 be adjourned. I am informed by counsel for plaintiff, Wylie Stecklow, Esq. that he will be out of the country from January 9, 2019 to January 13, 2019. Additionally, the undersigned is scheduled to begin a trial before the Honorable LaShann DeArcy Hall the following Monday, January 14, 2019. Counsel for the parties have conferred and are available on the following alternative dates: January 2, 3, 4, 8, 24, and 25.

Thank you for your consideration of this request.

Respectfully submitted,

/s

Angharad K. Wilson
Senior Counsel

cc: Wylie Stecklow, Esq.
Cary London, Esq.